

**DOCE CASTEL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

INFORMATION

- v. - :

19 Cr.

JESUS MANUEL ROJAS,

**19 CRIM 467**

Defendant. :  
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COUNT ONE

(Narcotics Conspiracy)

USDC SDNY  
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ELECTRONICALLY FILED  
DOC #:  
DATE FILED:

**JUN 21 2019**

The United States Attorney charges:

1. From in or about 2018 up to and including January 2, 2019, in the Southern District of New York and elsewhere, JESUS MANUEL ROJAS, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JESUS MANUEL ROJAS, the defendant, and others known and unknown, would and did distribute, and possess with the intent to distribute, controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JESUS MANUEL ROJAS, the defendant, conspired to distribute and to possess with the intent to distribute was 400 grams and more of a mixture and

substance containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

**FORFEITURE ALLEGATION**

4. As a result of committing the offense alleged in Count One of this Information, JESUS MANUEL ROJAS, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**SUBSTITUTE ASSET PROVISION**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred, or sold to, or deposited with, a third party;

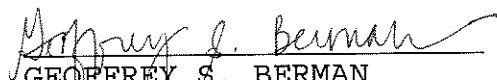
c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been comingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

  
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GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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19 Cr.

(21 U.S.C. § 846.)

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GEOFFREY S. BERMAN  
United States Attorney

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*Filed 6/21/2019*

*Judge Castel /fn*